

ROBERT MARINELLI
ATTORNEY
305 BROADWAY, 10TH FLOOR
NEW YORK, NEW YORK 10007
(212) 822-1427
Facsimile (212) 202-9646

January 26, 2018

VIA ECF

Honorable Sanket J. Bulsera
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Beauford et. als. v. City of New York, et al., 13-CV-7054 (LDH) (SJB)

Your Honor:

I am the attorney for plaintiffs. I write, with the consent of defense counsel, to request an extension of the discovery deadline from January 26, 2018 to February 26.

As Your Honor is aware, the plaintiff required the production of certain police paperwork before conducting the remaining depositions, See, Docket Entry 62. This paperwork was delivered late afternoon on January 26. Plaintiff is reviewing the approximately 120 pages provided for completeness and may have further requests based on these disclosures.

The parties continue to work diligently together and are hopeful that discovery will be completed within this timeframe. If a disagreement arises requiring judicial intervention, the parties will make a prompt judicial application.

I thank the Court for consideration of this request, and apologize for its lateness.

Sincerely,

/s

Robert Marinelli

Cc: Elizabeth Bardauskis, ACC